

FILED



4:27 pm, 4/29/25

Margaret Botkins
Clerk of Court

UNITED STATES DISTRICT COURT
DISTRICT OF WYOMING

JEFFREY VON HILL,
Plaintiff,

v.

MECHANICS BANK, HILLTOP HOLDINGS, DIGNITY HEALTH, ATHENA HEALTH, NORCAL
MUTUAL, MACDONALD AUXILIARY CORPORATION, HILL PHYSICIANS MEDICAL GROUP,
ELEVATION ONCOLOGY, CHASE BANK/KEYBANK, and DOES 1-100,
Defendants.

Civil Action No.: [To be assigned]

COMPLAINT FOR DAMAGES AND INJUNCTIVE RELIEF UNDER CIVIL RICO (18 U.S.C. §
1964(c))

I. INTRODUCTION

Plaintiff Jeffrey Von Hill, proceeding pro se, files this civil complaint under the Racketeer Influenced and Corrupt Organizations Act (RICO), 18 U.S.C. § 1964(c), against Defendants for an ongoing criminal enterprise involving identity theft, financial fraud, securities fraud, medical exploitation, real estate laundering, and foreign financial infiltration.

II. JURISDICTION AND VENUE

This Court has subject matter jurisdiction pursuant to 28 U.S.C. § 1331 (federal question jurisdiction) and 18 U.S.C. § 1964(c) (civil RICO).

Venue is proper in this Court under 28 U.S.C. § 1391 because Plaintiff resides in Wyoming and the effects of Defendants' enterprise continue to harm Plaintiff within this District.

III. PARTIES

Plaintiff:

Jeffrey Von Hill

Resident of Evanston, Wyoming.

Defendants:

Mechanics Bank (California financial institution)

Hilltop Holdings (fraudulent corporate entity)

Dignity Health (medical exploitation partner)

Athena Health (billing and data mining corporation)

NORCAL Mutual Insurance (fraudulent insurance coverage ties)

MacDonald Auxiliary Corporation (corporate conduit for fraud)

Hill Physicians Medical Group (healthcare exploitation entity)

Elevation Oncology (venture fraud entity)

Chase Bank/KeyBank (financial conduit entities)

DOES 1–100 (Unknown individuals and corporate actors to be named through discovery)

IV. FACTUAL ALLEGATIONS

Defendants acted in concert to:

Steal Plaintiff's identity and create fraudulent corporate entities;

Launder stolen real estate assets through Mechanics Bank and KeyBank;

Falsify ownership records and securities documents;

Exploit Plaintiff's medical campus intellectual property;

Launder healthcare billings through Dignity Health and Athena Health;

Connect financial fraud to foreign entities including Chinese-held shell corporations;

Conspire with public officials to shield these activities from investigation;

Inflict economic, personal, and medical damages on Plaintiff.

These activities constitute a pattern of racketeering activity under 18 U.S.C. § 1961.

V. CAUSES OF ACTION

First Cause of Action:

Violation of 18 U.S.C. § 1962(c) – RICO Participation in a Criminal Enterprise.

Second Cause of Action:

Violation of 18 U.S.C. § 1962(d) – RICO Conspiracy.

VI. DAMAGES

As a direct and proximate result of Defendants' racketeering activities, Plaintiff has suffered:

Loss of income and business opportunities;

Loss of medical facilities and real property;

Physical harm and medical exploitation;

Financial ruin and emotional distress.

Plaintiff seeks damages in an amount to be proven at trial, including treble damages under RICO.

VII. PRAYER FOR RELIEF

WHEREFORE, Plaintiff respectfully requests:

Treble damages under 18 U.S.C. § 1964(c);

Preliminary and permanent injunctive relief;

Asset forfeiture and restitution;

Costs of suit and any further relief deemed proper.

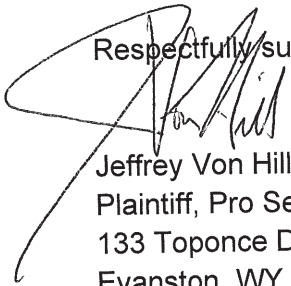
VIII. JURY DEMAND

Plaintiff demands trial by jury on all issues so triable.

IX. SIGNATURE

Dated: April 29, 2025

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Jeffrey Von Hill', is written over the text 'Respectfully submitted,'.

Jeffrey Von Hill
Plaintiff, Pro Se
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